EDEN P. QUAINTON QUAINTON LAW, PLLC

2 PARK AVE., 20TH FL. NEW YORK, NY 10016 245 NASSAU ST. PRINCETON, NJ 08540

TELEPHONE (212) 419-0575, (609) 356-0526 CELL: (202) 360-6296 EDEN.QUAINTON@QUAINTONLAW.NET

April 15, 2024

VIA ECF

Honorable Valerie Figueredo United States Magistrate Judge Southern District of New York 500 Pearl Street New York, New York 10007

> Re: <u>GateGuard, Inc. v. Amazon, com, Inc. et al., 21-cv-9321</u> <u>Request to Reschedule April 23, 2024 Conference</u>

Dear Judge Figueredo,

I represent the Plaintiff, GateGuard, Inc. ("Plaintiff" or "GateGuard") in the above-captioned action).

Your Honor has scheduled April 23, 2024, as a hearing date for various motions filed at Dkts. 123, 141-43 and 145. *See* Dkt. 147. I did not appreciate this at the time the conference was scheduled, but this year April 23, 2024 is the first day of Passover, which begins at sundown on April 22, 2024 and runs until sundown on April 30, 2024. For observant Jews, work is prohibited on the first two days of Passover (April 23 and April 24) and the last two days (April 29 and April 30). Limited work is permitted on the intermediate days between the first two and the last two days of Passover, although one of these days is also a Saturday this year. While I am not myself affected by these limitations, my colleague, Jonathan Gross, is, as are Ari Teman, GateGuard's founder, and David Teman, a consultant for GateGuard, both of whom have insight into the technical aspects of GateGuard's motion for spoliation sanctions, Dkt. 123. Accordingly, Plaintiff respectfully requests that the April 23, 2024 hearing be rescheduled to a date after Passover has concluded. Amazon opposes this request.

Respectfully submitted,

Den Quainton
Eden P. Quainton

cc: All counsel of record (via ECF)